

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

**DECLARATION OF BETH WILKINS IN
SUPPORT OF PLAINTIFFS' PORTION
OF JOINT LETTER REGARDING
LACEY KELLER AND JOHN
CHANDLER SUPPLEMENTAL
REPORTS**

This Document Relates to:

ALL CASES

Judge: Honorable Lisa J. Cisneros

1 I, Beth Wilkins, hereby declare as follows:

2 1. I am a partner in the law firm of Chaffin Luhana LLP. I am a member of the State
3 Bars of Illinois and Missouri and duly admitted to practice before this Court, representing Plaintiffs
4 in the above caption action. If called upon to testify, I could and would testify competently to the
5 truth of the matters stated herein.

6 2. On October 13, 2025, Uber's counsel offered two dates for the Todd Gaddis for a
7 30(b)(6) deposition on Uber's use of Flack and the process by which Uber identified, exported,
8 and produced the Flack data, October 16 and October 24, noting that Uber would greatly appreciate
9 if Plaintiffs could accommodate the later date. Plaintiffs agreed to accommodate the later date so
10 long as Uber made a full production of the Flack data, which was still forthcoming.

11 3. On October 15, 2025, Plaintiffs' counsel advised Uber counsel of errors Plaintiffs'
12 counsel identified in the Flack data production, including apparently missing data for the years
13 2012 through 2016, as well as a complete absence of any data for three fields that Uber had
14 previously identified as containing relevant data. Plaintiffs' counsel requested that Uber provide a
15 corrected production containing the three missing fields and verify that the production was
16 complete. Uber agreed to provide a corrected production but refused to provide a verification.

17 4. On October 17, 2025, Uber made a corrected production of the Flack data,
18 providing the data for the three fields that it omitted from the October 13 production. Given the
19 belated production and Plaintiffs' need for time to review the data for completeness and data
20 quality concerns, particularly in light of the errors in the initial production as well as numerous
21 errors and deficiencies in the productions of the Bliss and Jira data, combined with Uber's apparent
22 refusal to verify that it had produced all data, Plaintiffs were forced to postpone the October 24
23 deposition. In an effort for efficiency, Plaintiffs offered to instead provide written deposition
24 questions. Uber declined to provide responses to written deposition questions and instead offered
25 new deposition dates on October 29 or October 30. The deposition was reset for October 30.
26 Unfortunately, due to Plaintiffs' counsel's illness, the deposition needed to be rescheduled.
27 Plaintiffs took the deposition on November 7, the first date Uber offered after October 30, although
28 Plaintiffs requested an earlier date.

1 5. On December 5, 2025, I participated in a meet and confer discussion with counsel
2 for Uber regarding Ms. Keller and Dr. Chandler's supplemental reports. During that discussion,
3 Counsel for Uber indicated that Uber intends to have one rebuttal witness, who it had already
4 identified, and Uber agreed to produce that witness for deposition for an equal amount of time that
5 Plaintiffs will produce Keller and Chandler, respectively. Plaintiff indicated that they do not object
6 to Uber serving supplemental rebuttal reports.

7 6. On December 9, 2025, Plaintiff's counsel offered Ms. Keller for a 3-hour deposition
8 to take place either December 23, 2025 or January 5, 2026 and Dr. Chandler for a 3-hour deposition
9 to take place either December 29 or December 31, 2025. Uber has accepted the January 5 date for
10 Ms. Keller but has not accepted a date for Dr. Chandler.

11 Executed this 19th day of December, 2025 in Lebanon, Illinois.

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13 /s/ Beth Wilkins
14 Beth Wilkins
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